

1 FRANK A. TODDRE, II
2 Nevada Bar No. 11474
3 Frank.Toddre@lewisbrisbois.com
LEWIS BRISBOIS BISGAARD & SMITH LLP
4 6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Telephone: 702.893.3383
Facsimile: 702.893.3789
5 *Attorneys for Defendants Renee Baker,
Tara Carpenter, Scott Davis, Marc La Fleur,
and Kim Thomas*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 * * *

10 SAID ELMAJZOUB,

11 Plaintiff,

12 v.

13 SCOTT DAVIS, et al.,

14 Defendants.

15 Case No. 3:19-cv-00196-MMD-CSD

16 **STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
DEFENDANTS TO FILE A RESPONSE
TO PLAINTIFF'S MOTION FOR
ATTORNEY FEES AND COSTS AND TO
CONTINUE ORAL ARGUMENTS
(ECF NO. 111, 141)**

17 **(FOURTH REQUEST)**

18 Defendants, Renee Baker, Tara Carpenter, Scott Davis, Marc La Fleur, And Kim Thomas
(collectively, “Defendants”), by and through their Associate Counsel, Frank Toddre II, Esq. and of
19 the law firm Lewis, Brisbois, Bisgaard, and Smith LLP, and Plaintiff, Said Elmajzoub, by and
20 through his counsel, CAIR Legal Defense Fund, Gadeir I. Abbas, Lena F. Masri, Justin Sadowsky,
21 and Allen Lichtenstein, respectfully submit the following Stipulation and Order to Extend the
22 Deadline for Defendants to File a Status Report regarding Jumu’ah services and continue the
23 presently set status conference.

24 Upon receipt of the previous stipulation continuing deadlines, The Court denied the
25 following outstanding motions: Plaintiff's emergency motion to enforce (ECF No. 118),
26 Defendant's motion to strike (ECF No. 127) and Plaintiff's motion for attorney fees (ECF No. 132)
27 without prejudice to their reinstatement. (ECF No. 146)

28 The following deadlines are set before the Court based upon prior stipulation (ECF No. 148)

1 (1) A status conference is currently set for December 19, 2023.

2 (2) NDOC is to produce a status report regarding Jumu'eah services to this Court by
3 December 5, or a week prior to oral arguments.

4 The parties have agreed in principal to a resolution of the case and are finalizing the
5 settlement documents with a specific breakdown of costs to each side. Out of an abundance of
6 caution, the parties would request a sixty day continuance of all outstanding deadlines and oral
7 arguments on the Emergency Motion to Enforce to be set out to mid-August or a time convenient
8 to the Court. The parties are optimistic the matter should be finalized well before.

9 Since the last extension the parties have exchanged settlement documentation and redline
10 comments. There appear to be two clauses of the settlement agreement the parties are still finalizing
11 and negotiating. The majority of the settlement agreement has been approved by both sides.

12 Counsel had several more phone conversations since the October stipulation discussing very
13 specific changes to the settlement language regarding enforcement and any ongoing injunction.
14 Counsel for plaintiff is still reviewing the revisions with their client.

15 This extension also permits time for parties to understand and discuss any administrative and
16 tax issues regarding contemplated payments prior to signing. The parties will be submitting a
17 stipulation to dismiss claims at the finalizing of documents while preserving the Court's order of
18 injunctive relief.

19 Accordingly, the parties request the above deadlines be continued sixty (60) days as
20 presented herein:

21 (1) The Status Conference set for December 19, 2023 be continued until February 19, 2024
22 or the first available time thereafter.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2 (2) NDOC is to produce a status report regarding Jumu'eah services to this Court by February
3 5, 2024, or alternatively week prior to oral arguments.

4 DATED: December 6, 2023

DATED: December 6, 2023

5 By: /s/ Justin Sadowsky

6 Lena Masri
7 Gadeir I. Abbas
Justin Sadowsky
8 CAIR LEGAL DEFENSE FUND
453 New Jersey Ave., SE
Washington DC 20003

9 Allen Lichtenstein
10 3315 Russell Rd., No. 222
Las Vegas, NV 89120

11 *Attorneys for Plaintiff Said Elmajzoub*

By: /s/ Frank A. Toddre, II

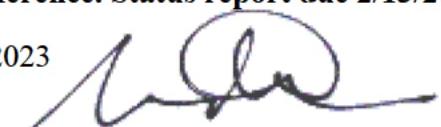
Frank A. Toddre, II
LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118

*Attorneys for Defendants Renee Baker,
Tara Carpenter, Scott Davis, Marc La Fleur,
and Kim Thomas*

13 **ORDER**

14 **IT IS SO ORDERED: hearing set for 12/19/2023 at 9:00 AM is reset to**
15 **2/20/2024 at 10:00 AM by video conference. Status report due 2/13/2024.**

16 DATED this 7th day of December, 2023

17 
United States District Court Judge